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March 24, 2020

VIA ECF

District Judge Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Angelo Morales v. C&S Wholesale Grocers, Inc.
US District Court, Southern District Civil No.: 18-3625 (MKV-GWG)
Our File: CSWG-1154591

Dear District Judge Vyskocil:

Please be advised that our office represents the defendant, C&S Wholesale Grocers, Inc. (C&S), in the above-referenced matter. We write pursuant to paragraphs 2(B) and 2(G) of Your Honor's individual rules, and with reference to Your Honor's Order, dated February 11, 2020 [Docket # 44], in order to discuss the status of discovery herein, as well as to request an adjournment of the case management conference scheduled for March 31, 2020.

Plaintiff's continued deposition, defendant's deposition, and independent medical examinations (IMEs) currently remain outstanding, and have yet to be scheduled due to outstanding paper discovery. Pursuant to Magistrate Judge Gabriel W. Gorenstein's Order, dated February 21, 2020 [Docket # 46], the deposition deadline and expert discovery deadline have both been extended to **June 15, 2020**. Given the uncertainty surrounding the current COVID-19 health crisis, as well as Governor Andrew Cuomo's March 20, 2020 Executive Order 202.8 mandating a 100% in-person workforce reduction, the parties shall endeavor to comply with the current discovery Scheduling Order, but a further extension of discovery deadlines may ultimately be required.

Accordingly, after conferring with plaintiff's counsel, Aiysha Wasi, Esq., the parties hereby jointly and respectfully request that the case management conference herein be adjourned and rescheduled for a date after the close of fact and expert discovery. Along these lines, the parties respectfully request that a date certain for the case management conference be set in late June, early July 2020, subject to Your Honor's availability.

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We thank Your Honor in advance for your time and attention to this matter. Please do not hesitate to contact the undersigned with any questions or concerns.

Respectfully submitted,

/s/

Ryan E. Dempsey


RED/

cc:

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The parties' request to adjourn the status conference previously scheduled to take place on March 31, 2020 is GRANTED. Accordingly, it is hereby ORDERED that the parties shall appear for a post discovery conference on Thursday, July 2, 2020. It is further ORDERED that, by June 25, 2020, the parties shall file a joint status letter and pre-motion submissions for any anticipated dispositive motions as required by the Court's Individual Rules.

Date: 3/24/2020
New York, New York


Mary Kay Vyskocil
United States District Judge